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7 Attorney for Leonard James Shove

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 LEONARD JAMES SHOVE,
15 Defendant.

Case No. 2:23-cr-00195-CDS-BNW

**STIPULATION TO CONTINUE
REPLY TO MOTION TO SUPPRESS
(ECF 20)**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Jean Ripley, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Aden Kahssai,
20 Assistant Federal Public Defender, counsel for Leonard James Shove, that the reply to the
21 motion to suppress (ECF 20) currently due June 17, 2024 be extended to July 1, 2024.

22 The Stipulation is entered into for the following reasons:

- 23 1. Mr. Shove needs additional time to consider the government's offer and discuss
24 negotiations with defense counsel.
- 25 2. Government counsel and defense counsel have a trial scheduled to commence
26 on June 18, 2024, which will continue for approximately one week and a half.
3. The defendant is incarcerated and does not object to the continuance.

1 4. The parties agree to the continuance.

2 5. The additional time requested herein is not sought for purposes of delay, but
3 merely to allow counsel for defendant sufficient time within which to be able to effectively and
4 complete investigation of the discovery materials provided.

5 6. Additionally, denial of this request for continuance could result in a miscarriage
6 of justice. The additional time requested by this Stipulation is excludable in computing the time
7 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
8 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
9 Section 3161(h)(7)(B)(i), (iv).

10 This is the first stipulation to continue filed herein.

11 DATED this 12th day of June, 2024.

12 RENE L. VALLADARES
13 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

14 By: Aden Kahssai

By: Jean Ripley

15 ADEN KAHSSAI
16 Assistant Federal Public Defender

 JEAN RIPLEY
 Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

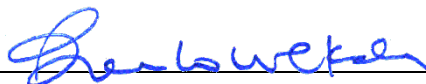
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4 UNITED STATES OF AMERICA,
5 Plaintiff,
6 v.
7 LEONARD JAMES SHOVE,
8 Defendant.

Case No. 2:23-cr-00195-CDS-BNW

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10 **ORDER**

11 IT IS THEREFORE ORDERED that the reply to the motion to suppress (ECF 20)
12 currently due June 17, 2024 be extended to July 1, 2024.

13 DATED this 13 day of June, 2024.

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16 UNITED STATES DISTRICT JUDGE
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